

EXHIBIT 18

SWORN STATEMENT OF ANDREA SUTTON

1. My name is Andrea Sutton. I am over the age of 21 and have personal knowledge of the contents of this statement.

2. I started at CRC in 1995 working in the mail room for about eight months. Working in the mail room was an entry level position where I pulled files and handled faxes.

3. In August 1996, I began working in Birmingham's Professional Liability Department. I worked as a technical assistant for Betsy Barnett. My duties included sending out submissions, handling quotes, and following up with agents.

4. After a couple of years or so, I moved to Dave Sloneker's team and worked on his team for about 15 years. After 15 years on Sloneker's team, there was one bonus period I did not receive a bonus. Sloneker had lost business in his book. This was the first and only time I have not received a bi-annual bonus.

5. Around 2013, I went to Rusty Hughes and requested to transfer teams. At that time, Corey Daugherty was looking to hire an account executive, and I ultimately moved to Daugherty's team.

6. When I joined the team, Clay Segrest, one of the brokers on the team, was traveling and building his book of business. Segrest worked most of his accounts on his own from start to finish. I helped Segrest some, but 80% of my work was with Daugherty.

7. I know Segrest was bringing in new business from his own agents because I cleared some of those accounts for him. They were agents Daugherty did not have accounts with.

8. I know bonuses are based on the team's revenue. Daugherty's team has had higher revenue than Sloneker's team did, and my bonuses have been higher on Team Daugherty. Daugherty is very fair with bonuses.

9. In my role as account executive, I clear new business, quote, bind, process, send out to market, and correspond with agents. Daugherty and Segrest also do these tasks as needed, but they are also responsible for knowing coverages off the top of their head and understanding insurance policies. They also have to travel and develop new business. I do not have to have the coverage and policy knowledge they do, and I am not required to travel and bring in new business.

10. When Kathryn Hendrix was on our team, she complained frequently about everything from work to politics and the weather. Her biggest complaint seemed to be against Clay Segrest. She expressed to me that she did not like him. She would constantly look to see what Segrest's revenue was and would say he was not bringing in as much as he should be. I don't know how she could have known what Segrest was bringing in or how she would know that wasn't good enough. It seemed like she was jealous of Segrest.

11. Hendrix expressed to me that she was having to do things outside of her job as inside broker such as requesting loss runs. I also heard Hendrix tell me and the other account executives that we were not doing our job duties either. She told us the account executives should not be marketing but that was her duty only. She wanted to take marketing away from us with agents we had been working with for years before Hendrix was even on the team. I never heard her bring this to Daugherty, but I don't think he would have liked that. Daugherty has expressed it is important to him to maintain established relationships with agents.

12. Hendrix told me she wanted to be an inside broker. She didn't want to have to travel, cold call, and bring in new business.

13. I helped Hendrix on quotes when I wasn't busy and would have helped her if she forwarded something to me or asked. I would have helped her if she thought she needed help while traveling. Everyone helps out if someone is traveling or out of the office.

14. After Hendrix had been complaining she had too much work as an inside broker, I offered to take one of her agents – McGriff Research Triangle – and Daugherty moved that agent to me. I already had more agents and revenue I was managing than Hendrix, but I wanted her to be successful and happy.

15. If Daugherty would have reassigned Hendrix's agents to me and the other account executives after she became an inside broker, I don't know what work Hendrix would have to do. I do not know anyone at CRC who only marketed a broker's business. Daugherty and Segrest were brokers with different responsibilities, but Hendrix said she didn't want to travel and build a book of business.

16. I get invitations to business events through the department email. I expect I don't get invites to everything. Sometimes the carriers invite certain people like those they do business with. I haven't ever felt excluded.

17. Not long before Hendrix went on leave there was one day she started crying and left early for the day. She told me Daugherty had asked her to do a loss run, and she felt like that wasn't her job. Loss runs only take a couple minutes and everyone does them when needed. Daugherty was traveling, and Segrest was also out of the office that day.

18. Hendrix was smart but she seemed consumed by what other people were doing rather than focusing on her own work.

19. When Lauren Lindberg was given an office, Hendrix got really upset and complained it was unfair.

20. I traveled with Daugherty on a couple trips and could have traveled more if I wanted to. I did not express an interest in traveling more. I don't think I have too much work to travel. I would just catch up afterwards.

21. After Hendrix left, Daugherty divided her agents between me, Yvette Talsma, and Tiffany Sanders. I didn't think that was too much work.

22. CRC has given me every opportunity. I have been able to move up in the company and enjoy my job as an account executive. I have never expressed interest in being a broker.

I declare under penalty of perjury that the foregoing is true and correct.

Andrea Sutton

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